

**FILED**UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICOIN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

JAN 09 2020

MITCHELL R. ELFERS  
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**JODIE MARTINEZ,**

Defendant.

CR. No. 20-80 KWRCount 1: 18 U.S.C. §§ 1153 and 1112:  
Involuntary Manslaughter;Count 2: 18 U.S.C. §§ 1153 and  
113(a)(6): Assault Resulting in Serious  
Bodily Injury.INDICTMENT

The Grand Jury charges:

Count 1

On or about July 6, 2019, in Indian Country, in McKinley County, in the District of New Mexico, the Defendant, **JODIE MARTINEZ**, an Indian, unlawfully killed John Doe, while in the commission of an unlawful act not amounting to a felony, that is while: (1) violating New Mexico's statute prohibiting driving under the influence of drugs, N.M. Stat. Ann. § 66-8-102, by driving a vehicle and as the result of using drugs, being less able to the slightest degree, mentally and physically, to exercise the clear judgment and steady hand necessary to handle a vehicle with safety to the person and the public; and (2) violating New Mexico's statute prohibiting reckless driving, N.M. Stat. Ann. § 66-8-113, by driving a motor vehicle without due caution and circumspection and with a wanton and reckless disregard for human life when she knew and should have known that her conduct imperiled the lives of others.

In violation of 18 U.S.C. §§ 1153 and 1112.

Count 2

On or about July 6, 2019, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **JODIE MARTINEZ**, an Indian, assaulted Jane Doe, and the assault resulted in serious bodily injury.

In violation of 18 U.S.C. §§ 1153 and 113(a)(6).

A TRUE BILL:

/s/  
FOREPERSON OF THE GRAND JURY

G C Chashe  
Assistant United States Attorney

MS 12/30/2019